

November 16, 2015

Ms. Rebecca Chu  
U.S. Environmental Protection Agency, Region 10  
1200 Sixth Avenue, AWT-121  
Seattle, Washington 98101

**BY E-MAIL ONLY**

**RE: MONTHLY PROGRESS REPORT – OCTOBER 2015  
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION  
IMPLEMENTATION  
U.S. EPA DOCKET NO. CERCLA-10-2013-0032  
SEATTLE, WASHINGTON  
FARALLON PN: 831-032**

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during October 2015 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order on Consent (Settlement Agreement) for Removal Action Implementation at the Site issued by U.S. Environmental Protection Agency (EPA) Region 10 on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, Farallon currently estimates that approximately 75 percent of the required work is complete.

This monthly progress report provides:

- A summary of field activities conducted during October 2015;
- Analytical results for samples collected during October 2015;
- A summary of deliverables submitted and received during October 2015;
- A summary of technical and regulatory meetings during October 2015;
- A summary of planned activities, meetings, and deliverables for November and December 2015; and
- A summary of deviations from the Settlement Agreement schedule anticipated for November and December 2015.

**FIELD ACTIVITIES – OCTOBER 2015**

Interim surface sediment sampling field activities occurred between October 5 and 9, 2015 and on October 13, 2015. Surface sediment samples were collected at intervals of 0 to 2 and 0 to 10



centimeters in depth in accordance with the EPA-approved Operations Monitoring and Maintenance Plan Addendum No. 2 dated July 16, 2015 (OMMP Addendum No. 2). Sampling was performed in close coordination with EPA oversight personnel and no health and safety issues occurred. In addition, EMJ sent requests to EPA for the following proposed deviations resulting from conditions encountered in the field:

- On October 9, 2015, in coordination with EPA oversight personnel present on the boat, EMJ collected a sample at a revised location approximately 22 feet west of the original sample station LTR-7 based on visual observations of smaller grain size material. Sample station LTR-7 was relocated due to the size of the material (1.5- to 2-inch cobbles with scattered riprap) present at the original proposed location. In an October 9, 2015 e-mail, EPA approved the revised location for sample station LTR-7 and stated that the revised location was consistent with OMMP Addendum No. 2 requirements.
- On October 7, 2015, EMJ sent an e-mail to EPA stating that the EMJ field sampling team identified that the location of Outfall 003 depicted on Figure 2 and in Table 2 in the OMMP Addendum No. 2 was slightly offset from the actual location. EMJ submitted an updated Figure 2 to EPA showing the correct location of Outfall 003, which resulted in slight relocations of the previously EPA-approved sampling locations along the red arcs shown in Figure 2. EMJ also submitted an updated Table 2 to EPA with the revised sampling coordinates. On October 9, 2015, EPA sent an e-mail to EMJ stating that EPA had reviewed the revised coordinates pertaining to the sampling locations specific to the discharges from Outfall 003 (i.e., sample stations LTR-14 through LTR-22) and confirmed that the revised coordinates were consistent with EPA's required modifications to the OMMP Addendum No. 2.

#### **ANALYTICAL RESULTS – OCTOBER 2015**

No laboratory analytical results were received in October 2015. The laboratory analytical data from the interim surface sediment sampling were received on November 9, 2015. The validated data are expected to be received the second week of December 2015.

#### **DELIVERABLES – OCTOBER 2015**

The Monthly Progress Report – September 2015 was submitted to EPA on October 15, 2015.

#### **TECHNICAL AND REGULATORY MEETINGS – OCTOBER 2015**

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge, and The Boeing Company (Boeing), the parties participated in a joint project coordination meeting with EPA on October 12, 2015 and a coordination meeting with Boeing and Jorgensen Forge on October 26, 2015.



## **PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – NOVEMBER AND DECEMBER 2015**

### **Activities**

No activities are planned for November and December 2015. A summary of the interim surface sediment sampling conducted in October 2015 is expected to be presented in the December 2015 monthly progress report.

### **Meetings**

Project coordination meetings with Boeing are scheduled to occur on November 23 and December 21, 2015, and joint project coordination meetings with Boeing and EPA are scheduled for November 9 and December 7, 2015.

### **Deliverables**

The following deliverables have been or will be provided to EPA during November and December 2015:

- Monthly Progress Report – October 2015 by November 15, 2015; and
- Monthly Progress Report – November 2015 by December 15, 2015.

## **DEVIATIONS FROM SETTLEMENT AGREEMENT SCHEDULE – NOVEMBER AND DECEMBER 2015**

No deviations from the Settlement Agreement schedule are anticipated in November and December 2015.

## **CLOSING**

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

**Farallon Consulting, L.L.C.**

Amy Essig Desai  
Principal

cc: Mr. E. Gilbert Leon Jr., EMJ (by e-mail only)  
Mr. Miles Dyer, Jorgensen Forge Corporation (by e-mail only)  
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